

Regulatory Impact Statements accompanying the Cabinet paper, Firearms reform programme – Phase 2: Supporting shooting clubs and ranges, and formalising the transfer of the Arms Act 1983

The Ministry of Justice has prepared two Regulatory Impact Statements (RIS) to accompany the Associate Minister of Justice's Cabinet paper, *Firearms reform programme – Phase 2: Supporting shooting clubs and ranges, and formalising the transfer of the Arms Act 1983*.

Interim RIS (A), *Supporting shooting clubs and ranges*, addresses the majority of the proposals in the Cabinet paper, focused on shifts in the regulatory settings applied to shooting clubs and ranges. Cabinet agreement is sought to consult on the package of proposals. A targeted stakeholder consultation process is proposed, supported by a discussion document.

RIS (B), *Short-term adjustment to non-pistol club reporting requirements*, is focused on a proposal to adjust the annual reporting requirements applied to non-pistol clubs as a short-term measure. To achieve this, Cabinet agreement is sought to the Associate Minister of Justice amending the Arms Regulations 1992 through an Order in Council, allowing the proposal to take effect as soon as possible.

The Minister is not proposing to consult with external parties on this change, citing section 74(4) of the Arms Regulations 1992, that provides for the Minister to make changes to the Regulations without consulting, where the Minister is satisfied that in the circumstances it was not practicable to consult, as the Regulations would otherwise require.

Interim Regulatory Impact Statement (A): Supporting shooting clubs and ranges

Purpose of Document	
Decision sought:	Analysis prepared to support Cabinet decisions on potential improvements to the regulation of shooting clubs and ranges, and related short-term measures.
Advising agencies:	Ministry of Justice
Proposing Ministers:	Associate Minister of Justice
Date finalised:	9 May 2024
Problem Definition	
<p>The Government has committed to firearms regulatory reform in the current Parliamentary term, beginning with “repealing and replacing” Part 6 of the Arms Act 1983, relating to shooting clubs and ranges. The Minister is concerned that the regulatory framework applied to clubs and ranges is difficult to understand, and unwarranted from a safety perspective. Continuation of the status quo may contribute to the closure of shooting clubs and ranges that are not able to comply with regulatory requirements, ultimately compromising the role that clubs and ranges play as critical contributors to firearm safety.</p>	
Executive Summary	
<p>Shooting clubs and ranges provide a place for people to learn how to safely operate firearms, build confidence through practice, and engage in sporting competition. There are 396 shooting clubs in New Zealand and 1,184 shooting ranges.</p> <p>The regulatory framework governing the operation of these clubs and ranges is provided through the Arms Act 1983 (the Act) and the Arms Regulations 1992 (the Regulations). Significant amendments were made to the framework in 2020, prompted by the terrorist attack on the Christchurch masjidain on 15 March 2019. These included the introduction of purposes for the Act, emphasising safety (for users and the wider public).</p> <p>As part of these changes, Part 6 of the Act was introduced, covering the regulation of clubs and ranges. Part 6 came into force in June 2022, and the related Regulations in December 2022. Police data on the approvals of shooting clubs and ranges suggests that clubs and range operators have successfully transitioned to meet the new regulatory requirements. All clubs and ranges that made their applications to operate in the required timeframes are continuing to operate.</p> <p>The National-ACT Coalition Agreement includes a commitment to amend Part 6 of the Act and the associated Regulations, as part of a suite of actions focused on firearms reform. The Minister seeks to simplify aspects of the regulatory regime with a focus on ensuring that requirements placed on shooting clubs and ranges can be clearly justified in terms of the objectives of the Act.</p> <p>The Cabinet paper presents a suite of proposals, designed to maintain a focus on firearms safety, while reducing the compliance burden placed on shooting clubs and ranges, as appropriate. The Minister is seeking Cabinet’s approval to consult on the package of proposals. A targeted stakeholder consultation process is proposed, supported by a discussion document.</p>	

Ministry of Justice officials have assessed the proposals against the counterfactual. We have applied a set of criteria that the Minister has agreed will provide the framework for firearms regulatory reform: promotion of public safety, effective implementation, proportionate, and protecting individual freedoms (e.g. Bill of Rights Act considerations).

Officials consider that there are too many uncertainties to confidently assess the likely net impact of the proposals (presented as option two). Potential safety implications and unintended consequences are untested, because consultation has not been possible to date. Proposed targeted stakeholder consultation will provide more information on which to analyse the impacts of these proposals, and may identify new options, or variations of the proposals presented, to inform the ongoing development of advice.

Limitations and Constraints on Analysis

Narrow scope

Officials received very clear commissioning from the Minister, who has an in-depth knowledge of, and experience in, shooting clubs and ranges. The Minister shared these insights with officials, to identify key areas of concern with the regulatory regime and proposals to address these. This commissioning, combined with time constraints, has limited the scope of options developed.

Minimal evidence base and data analysis

Information supporting the problem definition has been sourced primarily from feedback from stakeholders associated with shooting clubs and ranges, provided to the Minister. We also drew on the submissions analysis undertaken during the development of proposals to inform the 2020 amendment to the Act. This provided a proxy for consultation at this point in the policy development process. As a result, information to date has been sourced predominately from those affiliated with shooting clubs and ranges.

Police have provided data and insights from their experience as the firearms regulator. However, the current legislative requirements have been in place for less than a year, resulting in little evidence (and no reliable trends) about any positive and negative impacts of the requirements. Further, prior to those changes, non-pistol clubs and ranges were not regulated under legislation, and pistol clubs were regulated through a Letter of Agreement between Police and the Pistol New Zealand. This has limited the data available about the previous approach.

Assumptions about the scale and significance of the problem

The paucity of available information means that it is difficult to assess the scale and significance of the issues experienced by shooting clubs and ranges. The proposals under consideration are therefore based on an assumption that the risk is of a scale that warrants regulatory change.

Ministry of Justice is building its firearms policy capability

Responsibility for the Act and the Regulations and related policy advice shifted from New Zealand Police (Police) to the Ministry of Justice in January 2024. Justice officials (aided by Police) have been working at pace to develop their knowledge of the Act and the Regulations. Our ability to prepare advice in the tight timeframes has been constrained in this capability-building and knowledge transfer phase.

Sequencing of regulatory reform

The National-Act Coalition Agreement prioritised the review of Part 6 ahead of wider planned reform of the Act. This has constrained our ability to explore options that would require more substantive or fundamental changes to the Act. It also carries a risk that key stakeholders are

subject to multiple regulatory changes, should the wider reform of the Act result in further adjustments to the Part 6 provisions.

Officials consider that many of the constraints listed will be mitigated (in the first instance) by plans to consult stakeholders on the proposals. Ultimately, the planned full-scale review of the Act will provide an opportunity for broader consultation, and to review the ‘fit’ of changes made to Part 6 with emerging advice.

Level of confidence

Ministers are being asked to agree to consult on the package of proposals to amend the regulatory framework applied to shooting clubs and ranges. While the constraints outlined above have limited officials’ ability to develop a range of options, Ministers can be confident that the proposed targeted consultation process will provide an opportunity to test the problem definition and proposals, and potentially generate new options. We anticipate that stakeholder consultation will also assist to identify any unintended consequences of the proposals.

Responsible Manager(s) (completed by relevant manager)

Rajesh Chhana
Deputy Secretary Policy
Ministry of Justice



09 / 05 / 2024

Quality Assurance (completed by QA panel)

Reviewing Agency: Ministry of Justice

Panel Assessment & Comment:

The Ministry of Justice’s Regulatory Impact Assessment quality assurance panel has reviewed the Regulatory Impact Statement “*Interim RIS (A) – Supporting clubs and ranges*” prepared by the Ministry of Justice and considers that the information and analysis summarised in the RIS **partially meets** the quality assurance criteria.

The interim RIS relies on an evidence base from one group of stakeholders. The consultation phase about to be undertaken provides an opportunity to gather broader community perspectives which may help improve the understanding of the problem definition and help to identify alternative options and improve understanding of costs and benefits.

In other respects, the analysis is balanced and supported by the analytical framework. The limitations and constraints are clearly signalled. Ministers can rely on the RIS in their decision-making, bearing in mind its interim nature.

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

Transfer of the Arms Act 1983 and firearms policy functions to the Ministry of Justice

1. In January 2024, the Prime Minister reassigned responsibility for the Act from the Police to the Justice portfolio. Amendments to the Act are required to give effect to this transfer. This will provide clarity on agencies roles and responsibilities in legislation and ensures the Minister of Justice and Secretary for Justice are responsible for policy functions.
2. The amendments are consequential to those decisions already taken and are administrative in nature. For these reasons, this RIS does not analyse these.

Snapshot of shooting clubs and ranges in New Zealand

3. Shooting clubs and ranges are intended to offer a safe place for people to learn how to operate firearms, build confidence and discipline through practice, and engage in sporting competition.
4. Police report that as at 22 April 2024, there were 396 shooting clubs in New Zealand – 303 non-pistol clubs¹ and 93 pistol clubs.² Some clubs are affiliated with a national organisation, such as the National Rifle Association and the New Zealand Deerstalkers Association.
5. There are 1,184 ranges in New Zealand, of which 412 are pistol ranges³ and 772 are non-pistol ranges.⁴ Some ranges are affiliated with shooting clubs, while others operate independently. Approximately 20% of range operators are commercial in nature.
6. Police estimate that approximately 20,000 to 40,000 individuals are affiliated to clubs across the country, representing approximately 8 to 16 percent of the 238,000 firearm licence holders in New Zealand.

The regulatory framework provided by the Arms Act 1983 and Arms Regulations 1992

7. The firearms regulatory regime is governed by the Act and the related Regulations.
8. Beginning in 2019, a series of changes were made to the regulatory regime, prompted by the terrorist attack on the Christchurch masjidain on 15 March 2019. This work was led by Police, as the agency responsible for the administration of the Act at the time.
9. Amendments to the Act included a new purpose, statement and related principles:

¹ 296 non-pistol clubs are approved and operating, and seven are not yet approved, but continue to operate because they existed before the legislative changes and made an application by 24 June 2023 for approval (the date specified under transitional arrangements).

² 92 pistol clubs have been recertified and are operating, and one pistol club is a new club that has not yet been approved. The new pistol club cannot operate until its application has been approved.

³ 411 pistol ranges are certified, and one is not yet certified as it is a new pistol range, and the application has recently been made. The new pistol range cannot operate until it has been certified.

⁴ 230 non-pistol ranges are certified and 542 have not yet been certified. Two of the non-pistol ranges that have not yet been certified cannot operate, as they are new ranges that made an application for certification after 24 June 2023.

Section 1A(1): The purposes of this Act are to—

- (a) promote the safe possession and use of firearms and other weapons; and
- (b) impose controls on the possession and use of firearms and other weapons.

Section 1A(2): The regulatory regime established by this Act to achieve those purposes reflects the following principles:

- (a) that the possession and use of arms is a privilege; and
- (b) that persons authorised to import, manufacture, supply, sell, possess, or use arms have a responsibility to act in the interests of personal and public safety.

New regulatory regime applied to clubs and ranges

10. Other changes introduced through the Arms Legislation Act 2020 included the introduction of Part 6 to the Act, covering the regulation of shooting clubs and ranges.
11. The changes were intended to:
 - give the regulator knowledge and oversight of all shooting clubs and shooting ranges, including where firearms are used and stored
 - require shooting clubs to have formal management and governance structures in place, to better achieve safety and responsibility in the use of firearms, and
 - provide greater assurance of the safe use of shooting ranges, for users and the general public.
12. The approach introduced greater consistency, and some cases formality, to the regulations of shooting clubs and ranges. For example, the oversight of pistol ranges involved voluntary compliance with standards for safe operation of ranges and involved Pistol New Zealand encouraging and enforcing compliance with the range standing orders. However, not all approved pistol shooting clubs were affiliated to Pistol New Zealand.

Requirements placed on clubs and ranges

13. Part 6 of the Act, together with Parts 5 and 6 of the Regulations, place requirements on any shooting club⁵ that uses a shooting range⁶ for its shooting activities,⁷ and all ranges.
14. All clubs falling within the definitions in Part 6 must have a certificate of approval to operate. All categories of ranges falling in the definitions in Part 6 must be certified to

⁵ Section 38A: A shooting club means a voluntary association of people who—
(a) act in accordance with a written set of rules, and
(b) participate in, or intend to participate in, shooting activities on a regular basis.

⁶ Section 38A: A shooting range—
(a) means a facility (whether indoor or outdoor), or a designated area of land, used by a shooting club or members of the public for the primary purpose of carrying out shooting activities, and
(b) includes any defence area ... used by a shooting club.

⁷ Section 38A: shooting activities
(a) means activities that are carried out using a firearm or an airgun for the purpose of shooting at inanimate targets (whether fixed or moving), but
(b) excludes
(i) paintball shooting, and
(ii) airsoft shooting.

operate. It is an offence, subject to a fine of up to \$10,000, if individuals do not comply with these requirements.

15. Other aspects of the regulation draw distinctions between:
 - pistol shooting clubs and the ranges they operate
 - non-pistol shooting clubs
 - non-pistol shooting ranges, and
 - shooting clubs on whose behalf firearms and/or ammunition are sold.
16. The legislation sets out requirements related to:
 - *the status of clubs and ranges*, including the need for shooting clubs to hold a certificate of approval and for ranges to be certified, incorporation (in some cases), and the duration of range certifications
 - *the application process to become approved/certified*, including who may apply, how applications must be made, and what information must be provided
 - *the criteria and conditions for approval/certification*, including rules for safe operation and facilities for secure storage
 - *ongoing obligations on approved clubs and certified ranges*, including what information must be recorded, retained, and provided, and renewal of range certification
 - *ongoing obligations on clubs if ammunition and/or firearms are held on their behalf*, including a requirement to be incorporated,⁸ and what information must be recorded and reported, and
 - *powers for monitoring and enforcement of approved clubs and certified ranges*, including inspection, issue of improvement notices, temporary suspension, and criteria for cancellation of approval/certification.

Approval and certification fees

17. A shooting club's approval lasts until it is surrendered by the club or is cancelled by the Commissioner of Police. The application fee is \$140 and the annual fee is \$40 for clubs that sell ammunition or firearms on behalf of others and \$30 for all other clubs.
18. Range certifications last for five years unless surrendered or cancelled by the Commissioner. A range operator must request a review of the range certification if they intend to operate the range in a way that departs from its certification conditions.
19. The range certification application fee is \$400 for a single range, and \$200 each time its certification needs to be renewed (so long as there has been no significant change to the design, construction, or operation of the range). The application fee increases to a maximum of \$625 for multiple ranges on the same site.

⁸ Pistol clubs must be incorporated in any case, but non-pistol clubs in this position must also be incorporated.

Ensuring regulatory compliance

20. The Firearms Safety Authority (FSA) is responsible for ensuring compliance with the regulatory regime. The FSA is currently a business unit of the NZ Police. As regulator, the FSA can:
- enter and inspect clubs and ranges
 - issue improvement notices
 - temporarily suspend operations on the basis of non-compliance with an improvement notice
 - cancelling the club's approval or range certification, and
 - ultimately bring prosecution against individuals for operating clubs and/or ranges that are not approved/certified.
21. We understand the FSA's compliance approach involves first engaging and educating the club/range operator, and then sending escalating reminders. This action is taken before improvement notices are issued, cancellations, and prosecution.

Implementation of new requirements

22. Part 6 of the Act came into force in June 2022, and Parts 5 and 6 of the Regulations came into force in December 2022. Since then, clubs, range operators, and Police have been working to implement the changes and adapt to the new requirements.
23. The transitional arrangements required existing clubs (excluding pistol clubs existing at 24 June 2022, which were deemed recognised by Police) to apply for certification approval and existing ranges (other than pistol ranges, which have been re-certified) to apply for approval by 24 June 2023.⁹ Clubs and range operators that made applications by that date have been able to continue to operate pending a decision on their application. However, new clubs and ranges cannot start operating until their applications have been approved.
24. Police data on the approvals of shooting clubs and ranges suggests that existing clubs and range operators have successfully transitioned to meet the new regulatory requirements:
- all clubs that have made their applications are continuing to operate
 - 92 pistol clubs have been recertified and continue to operate¹⁰
 - 296 non-pistol clubs have been approved and continue to operate
 - 7 non-pistol clubs have not yet been approved – they have applied and continue to operate, but Police is awaiting documentation to complete their approval, and
 - all ranges for which applications have been made (or were already recognised pistol ranges) are continuing to operate. There are 542 non-pistol ranges that are

⁹ Any existing ranges that were previously approved by the Commissioner for target pistol shooting under the Regulations have been treated as if they had been issued with a certificate (lasting for 5 years) under the new provisions. No further application was required for this to occur and Police have contacted these range operators and issued them with a certificate to this effect. These pistol range operators will need to apply to have the range certification renewed again before 25 June 2027.

¹⁰ Any pistol club that was approved by Police at 24 June 2022 (under the previous regime) could continue to operate and did not need to apply for approval, but was deemed approved under the new legislation.

not yet certified (only two of which are new applications that cannot operate until certified). All of the 540 existing applications have been triaged by Police and continue to be processed.

25. Improvement notices have been issued to some operators, to bring ranges up to a safe operating standard – with the number of notices issued decreasing over the transition period.

How the counterfactual may develop if no action is taken

26. The Minister is concerned that the current regulatory regime may contribute to the closure of some shooting clubs and ranges, if they struggle to meet the requirements placed on them. This could reduce the accessibility of clubs and ranges in some regions of New Zealand, and ultimately compromise the safety of firearms users and the wider community.

What is the policy problem or opportunity?

27. The Minister seeks to ensure the ongoing viability of shooting clubs and ranges as critical contributors to firearm safety, protecting the interests of both firearms users and those of the wider community.
28. The National-Act Coalition Agreement includes a commitment to amend Part 6 of the Act and the associated Regulations relating to clubs and ranges. This is part of a suite of actions focused on firearms reform, cumulating in a commitment to rewrite the Act, to provide for greater protection of public safety and simpler regulatory requirements to improve compliance.
29. The Minister has received feedback from some stakeholders associated with shooting clubs and ranges suggesting that they have struggled with the requirements established by the regulatory framework. We understand that stakeholders have submitted that the regulatory requirements are unnecessarily burdensome, particularly as all clubs and some ranges are run by volunteers.
30. Feedback received by the Minister includes:
 - questions about the contribution that aspects of the current regulatory requirements make to firearms safety,
 - concerns about a lack of communication and other supports available to support compliance with annual reporting and other requirements, and
 - concerns about the potential visibility of personal information in connection with membership of an incorporated society.¹¹

¹¹ The Council of Licensed Firearms Owners (COLFO) has raised a similar concern with the Companies Office (which maintains the Register of Incorporated Societies). The Act requires committee members' names to be published on a public register. An application can be made to the Registrar of Incorporated Societies to remove or omit this information from the register on the basis of public interest.

Who is affected and how?

Individuals affiliated with shooting clubs and ranges

31. We understand that the prioritisation of changes to Part 6 of the Act is based on feedback, conveyed to the Minister, that suggests regulatory requirements are overly burdensome and it is difficult to see the contribution that they make to firearms safety.
32. These concerns are consistent with submissions made to Police during consultation on proposals for regulating shooting clubs and ranges (undertaken in early 2022). The analysis of submissions (n = 1,080) noted the “significant opposition” to the proposals from submitters:

“Most submitters welcomed the purpose of the proposals to increase safety but considered that there was no evidence of the proposals achieving this in their current form. Many submitters referred to the impeccable safety record that ranges and clubs have and questioned the evidentiary base for the scope and breadth of the proposals. Submitters were concerned that the proposals would place a significant burden on clubs and ranges and would do little to increase safety. Rather, the burden imposed would result in some clubs and ranges closing and individuals being forced to undertake shooting activities in less safe environments outside the framework of these organisations.”¹²

33. We note that most people making submissions in the context of the 2020 regulatory review were members of a shooting club (69%); and/or a firearms licence holder (69%); and/or a range user (68%).
34. Following feedback, Police re-assessed the draft proposals taking a risk-based and proportionate regulatory approach. This resulted in several changes, some of which reduced information requirements in areas where there was no clear regulatory purpose, and where existing sources of information could be used. However, new information requirements were also added.

Wider New Zealand public

35. It is likely that the public will have a range of perspectives on the potential reform of the regulations applied to shooting clubs and ranges – particularly from a safety perspective.
36. Due to the likely diverse range of stakeholder interests in the safe and effective regulation of shooting clubs and ranges, Cabinet is now being asked to approve a formal consultation process, aided by a discussion document.

What objectives are sought in relation to the policy problem?

37. The overarching objectives for firearms regulatory reform is to deliver a system that:
 - supports the safe possession and use of firearms and other weapons for legitimate purposes (e.g. sport, hunting, collecting and pest control), and

¹² Allen + Clarke, “Proposals for regulation of shooting clubs and ranges – analysis of submissions from consultation”, 27 May 2022, [proposals-regulation-shooting-clubs-ranges-analysis-submissions-consultation.pdf](https://www.police.govt.nz/consultation/proposals-regulation-shooting-clubs-ranges-analysis-submissions-consultation.pdf) ([police.govt.nz](https://www.police.govt.nz))

- imposes controls that protect individual and public safety from firearms-related harm.

In addition, proposed changes to Part 6 of the Act and associated Regulations seek to reduce the burden on clubs and ranges, helping to ensure the ongoing viability of shooting clubs and ranges as critical contributors to firearm safety. The Minister is committed to ensuring that the regulatory burden is justified, while maintaining a focus on minimising risks to the safety of firearms users and the general public.

Section 2: Deciding upon an option to address the policy problem

What criteria will be used to compare options to the status quo?

38. The following assessment criteria were used for option assessment:

Criteria	Description
Promote public safety	<ul style="list-style-type: none"> • Contribute to protecting the public from firearms-related harm
Effective implementation	<ul style="list-style-type: none"> • Simple and easy to understand and apply • Provide for effective and efficient delivery of service
Proportionate	<ul style="list-style-type: none"> • Requirements are necessary to achieve the overarching objective
Protect individual freedoms	<ul style="list-style-type: none"> • Protect individual freedoms and rights and the security and privacy of personal information

39. We note that there may be tensions between some aspects of these criteria, for example judgement calls around the measures necessary to protect public safety, and perceptions about what constitutes efficient and effective regulation.

What scope will options be considered within?

40. Our scope has been limited by the National-Act Coalition Agreement to move immediately to “repeal and replace” Part 6 of the Act. Consideration has not been given to non-regulatory approaches.
41. Officials have received very clear commissioning from the Minister, who has an in-depth knowledge of, and experience in, shooting clubs and ranges. The Minister has drawn on this experience, together with feedback received from the sector, to identify ‘pain-points’ for clubs and ranges. These include concerns about the complexity of regulation, costly and time-consuming requirements, and a lack of clear rationale for some obligations.
42. Time constraints have further limited our ability to develop feasible options. Additionally, the Ministry has had to build its knowledge of firearms policy and regulation quickly, as responsibility shifted from Police to the Ministry of Justice in January 2024.
43. As noted elsewhere, minimal consultation has been possible to date, and the evidence base primarily consists of feedback provided by stakeholders associated with shooting clubs and ranges.

What options are being considered:

44. The two options presented are the counterfactual and the proposals contained in the Cabinet paper.

Option One – counterfactual

45. Part 6 of the Act, together with Parts 5 and 6 of the Regulations, provide the regulatory framework within which shooting clubs and ranges (as defined by Part 6) must operate.
46. Records maintained by the FSA demonstrate that, to date, shooting clubs and ranges have successfully transitioned to the new regulatory regime and continue to operate. However, the Minister is concerned that feedback received indicates that some clubs and ranges are at risk of closing, as they struggle to meet the certification, reporting, and other requirements.
47. Maintaining the status quo therefore carries a possibility that shooting clubs and ranges may struggle to operate effectively, or ultimately close, compromising the contribution that they make to firearm safety. However, we have not been able to quantify the likely scale or significance of this risk.

Option Two – a simplified regulatory regime

48. This option seeks to simplify aspects of the regulatory regime with a focus on ensuring that requirements placed on shooting clubs and ranges can be clearly justified in terms of the objectives of the Act. Proposals aim to maintain a focus of firearms safety, while reducing the compliance burden placed on shooting clubs and ranges, as appropriate.
49. Specific proposals, outlined in the Cabinet paper and accompanying discussion document, include:
 - keeping the majority of requirements on pistol clubs and the ranges they operate but streamlining some of those requirements
 - introducing a new ‘enrolment’ system for non-pistol clubs (amending and replacing current approval requirements)
 - removing certification requirements for non-pistol ranges, and replacing these with a requirement to comply with shooting range standing orders approved:
 - by a governing body for ranges affiliated with a club or other association, or
 - by the regulator for ranges that are operated independently of a club or other association (e.g. ranges run by commercial operators)
 - modifying compliance tools that can be exercised against non-pistol shooting clubs and ranges, and
 - reducing the record keeping and reporting requirements for shooting clubs, if firearms and/or ammunition are sold on their behalf.
50. Compared with the counterfactual, this option is focused on reducing the compliance burden on shooting clubs and ranges, thereby supporting them to remain in operation.

How do the options compare to the counterfactual?

	Option One – counterfactual	Option Two – simplified regulatory regime
Promote public safety	0	- Seeks to ensure clear alignment between regulatory requirements and public safety imperatives. May assist some clubs and ranges to remain in operation, where they may otherwise close, this maintains the assumed public safety benefits that the network of shooting clubs and ranges may contribute to. (However, scale of risk of closures is not known, nor are resultant impacts on safety). Potential reduction in safety outcomes for those using clubs and ranges and the public, as measures intended to improve safety are removed/replaced (proposed stakeholder consultation will assist to inform this).
Effective implementation	0	+/- Simplifies certification/enrolment and reporting requirements, and likely to result in improved administration efficiency for shooting clubs and ranges. The implications for the effectiveness of service delivery by the FSA are not clear – it may make it more difficult to maintain an oversight of the activities of clubs and ranges and (for example) target compliance activities. This could be seen as undermining the safety purposes of the Act
Proportionate	0	0 Views on proportionality are likely to differ across different sets of stakeholders. Planned consultation will assist to inform the appropriate balancing of public safety and regulatory burden.
Protect individual freedoms	0	0 Any concerns about privacy of information provided as part of the application process, including application as an incorporated society, and ongoing approval/certification requirements are likely to remain the same. The proposals are unlikely to compromise other individual freedoms associated with the New Zealand Bill of Rights Act 1990 (e.g. the right to be secure from unreasonable search and seizure).
Overall assessment	N/A	Officials consider that there are too many uncertainties to confidently assess the likely net impact of the option. In particular, potential safety implications and unintended consequences are untested, because consultation has not been possible to date.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

51. Given the constraints officials have operated within to prepare advice on the matters under consideration, the Ministry has not identified a preferred option at this point. Proposed targeted stakeholder consultation will provide more information on which to analyse the impacts of these proposals, and may identify new options, or variations of the proposals presented, that will inform the ongoing development of advice.

What are the marginal costs and benefits of the option?

52. Figures used below are based on current firearms fees. The Minister of Finance has asked that a review of fees be undertaken. The Ministry plans to prepare this advice in the latter part of 2024, and the work will reflect any changes made to the regulation of clubs and ranges.

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
<i>Police/FSA</i>	<p>Loss of some mechanisms that assist the regulator to maintain oversight of clubs and ranges may result in a need for (potentially more costly) monitoring and enforcement mechanisms.</p> <p>May be some cost-saving for the regulator as a result of reduced monitoring requirements (where existing requirements are removed e.g. annual reports)</p>	Monetisable (unquantified)	Low
<i>Shooting clubs and ranges</i>	<p>Potential reduction in safety outcomes for those using clubs and ranges as measures intended to improve safety are removed/replaced.</p> <p>However, certainty is limited by unknown scale/scope of the problem definition.</p>	Non-monetisable (unquantified)	Low
<i>Wider community/ general public</i>	<p>Potential reduction in safety outcomes for the general public as measures intended to improve safety are removed/replaced.</p> <p>However, certainty is limited by unknown scale/scope of the problem definition.</p>	Non-monetisable (unquantified)	Low
Total monetised costs		N/A	
Non-monetised costs			Low
Additional benefits of the preferred option compared to taking no action			
<i>Non-pistol shooting range operators</i>	Removing the need for the 772 non-pistol shooting ranges to be certified reduces costs for shooting range operators (application and renewal costs), and any other costs incurred in the process.	At least \$400 initial application and \$200 renewal every 5 years	High
<i>Shooting clubs and ranges</i>	<p>May result in other lower costs for clubs and ranges, including on the time of volunteers.</p> <p>Low certainty due to lack of consultation.</p>	Monetisable (unquantified)	Low
<i>Wider community/ public</i>	May assist some clubs and ranges to remain in operation, where they may otherwise close, this maintains the assumed public safety benefits that the network of shooting clubs and ranges may contribute to. (However, the scale	Non-monetisable	Low

	of risk of closures is not known, nor are resultant impacts on safety).		
Total monetised benefits		N/A	
Non-monetised benefits			Low

Section 3: Delivering an option

How will the new arrangements be implemented?

53. Implementation arrangements will be identified once final decisions have been taken on the policy approach. It is possible that the proposed targeted stakeholder engagement will result in options being amended, or new options emerging.

How will the new arrangements be monitored, evaluated, and reviewed?

54. Monitoring arrangements will be identified once final decisions have been taken on the policy approach. It is possible that the proposed targeted stakeholder engagement will result in options being amended, or new options emerging. Ultimately, officials will consider the fit of the package of Part 6 proposals in the context of the planned wider review of the firearms regulatory regime.